

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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**In re Pork Antitrust Litigation**

This Document Relates To All Actions

Case No. 18-cv-01776-JRT-JFD

**DECLARATION OF TYLER  
TWEETEN**

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Pursuant to 28 U.S.C. § 1746, I, Tyler Tweeten, declare as follows:

1. I have worked for Hormel Foods Corporation (“Hormel Foods” or the “Company”) for twelve years, and my current position is Data Engineering Team Lead. I make this Declaration based on my personal knowledge.

2. My job responsibilities include managing databases that contain data related to Hormel Foods’ sales. I was involved in extracting transactional data from the Company’s databases to respond to discovery requests made during this litigation. That process involved generating reports showing all sales transactions of a specified set of products meeting the definition of “Pork” used in the litigation.

3. Extracting and exporting data from the Company’s databases is a significant undertaking that is not part of our usual operations. Given the volume of transactional data involved in the previous production, the process of running queries and generating tables took multiple days. That effort resulted in 33 spreadsheets containing nearly 39 gigabytes of data produced in compliance with Plaintiffs’ requested deadlines. I was responsible for that task based on my knowledge of the relevant databases, and there is no realistic way to delegate that process to other employees.

4. I understand that Plaintiffs now seek additional productions of sales data showing the Company's sales of a much broader, different set of products based upon a different definition of "Pork" used previously in the litigation. These new reports would be substantially more difficult than the process of producing sales data during discovery. The new request seeks sales data for a broader set of products that cannot be generated without a specific product list. Given the volume of data, the process of creating the tables showing transactions related to those products would require extensive and sustained full-time effort. Even if limited to extracting raw sales data, responding to this request would involve at least as much effort as the data production during discovery and likely more given the broad range of products that may be implicated.

5. Hormel Foods' sales databases are designed to store data and generate reports for specific business purposes. The task of exporting data is intensive and time-consuming. It would be my job to design queries to generate tables of data. Given the volume of data, the process of generating tables requires substantial time.

6. Generating the additional sales reports Plaintiffs are proposing would be a massive undertaking. Attempting to complete that task would be extremely disruptive to the business and my ability to fulfil my normal job responsibilities.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 15, 2022

/s/ Tyler Tweeten  
Tyler Tweeten